

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

INA STEINER, *et al.*,

v.

JIM BAUGH, *et al.*

No. 21-cv-11181-PBS

DEFENDANT JIM BAUGH'S MOTION TO DISMISS AMENDED COMPLAINT

Pursuant to Fed. R. Civ. P. 12(b)(6), Defendant Jim Baugh moves to dismiss Counts II, IV, VIII, IX, X, XI, XII, and XIII of the Amended Complaint [D.E. 176] for failure to state a claim upon which relief may be granted.¹ A memorandum of law accompanies this motion.

Respectfully submitted,

JIM BAUGH

By his attorneys,

/s/ William W. Fick

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Dated: April 28, 2023

¹ Counts V, VI, VII, and XIV were not alleged against Mr. Baugh.

CERTIFICATE OF SERVICE

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non-registered participants on April 28, 2023.

/s/ William W. Fick